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BY ECF

Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Abdelrahman Hassab el Nabi v. City of New York, et al., 21 Civ. 3768 (LAK)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants City of New York, Sergeant Matthew Tocco, Police Officer Stephen Centore, and Deputy Inspector Elias Nikas. In that capacity, I write jointly with plaintiff's counsel, Tahanie Aboushi, Esq., to provide the Court with a status update pursuant to the Court's August 23, 2022 Order. The parties are scheduled to appear for a settlement conference before the Honorable Jennifer E. Willis, United States Magistrate Judge, on October 11, 2022, at 9:30 a.m. Accordingly, we respectfully request that the limited stay of discovery remain in place pending our participation in said conference. Should the Court grant this request, the parties propose filing a status update on or before October 14, 2022, advising the Court as to whether settlement discussions were successful, or, in the event we are unable to reach an agreement, with an updated schedule for the completion of discovery.

The parties thank the Court for its consideration herein.

Respectfully submitted,

/s/

Brian Francolla
Senior Counsel
Special Federal Litigation Division

cc: all counsel of record